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October 20, 2023

*Via Email:*  
[ajd@dimarinolaw.com](mailto:ajd@dimarinolaw.com)

Jay DiMarino, Esq.  
DiMarino, Lehrer & Collazo, P.C.  
52 Haddonfield Berlin Road, Suite 1000  
Cherry Hill, NJ 08034

**Re: *ECR4Kids v. dbest products, Inc., Civil Action No. 23-2675 (D.N.J.)***

Dear Jay:

In the interest of resolving the dispute and lawsuit, dbest makes the following covenant not to sue ECR4Kids:

dbest products, Inc. unconditionally and irrevocably covenants not to sue ECR4Kids, LP, for infringement of any claim of U.S. Patent No. 11,338,835 ("the '835 Patent") based on any product that ECR4Kids is currently making, using, selling, offering for sale, or importing, as of the date of this covenant, or any product that ECR4Kids made, used, sold, offered for sale, or imported at any time before the date of this covenant, including but not limited to the products identified in ECR4Kids' complaint in Civil Action No. 23-2675 in the District of New Jersey, bearing Amazon ASIN Nos. B006XQ7FGM, B01MRD19DQ, and B007CDOXO2.

This broad covenant should avoid any need for litigation over the '845 Patent, but if you would like to suggest any changes to the language, please do and dbest will consider them in good faith.

If you have any questions concerning these matters, please let me know promptly.

We look forward to working with you.

Very truly yours,

**Orbit IP, LLP**

A handwritten signature in blue ink, appearing to read "Ehab M. Samuel", is placed over a horizontal line. The signature is fluid and cursive, with a large, stylized "E" at the beginning.